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ATTORNEY FOR THE DEBTOR

IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF TEXAS SHERMAN DIVISION

DEBTOR'S RESPONSE TO CHAPTER 7 TRUSTEE'S MOTION TO COMPEL TURNOVER OF DOCUMENTATION

TO THE HONORABLE BRENDA T. RHOADES, UNITED STATES BANKRUPTCY JUDGE:

John T. Hoefer (the "Debtor") files his Response to the Chapter 7 Trustee's Motion to compel Turnover of Documentation (the "Motion"), and respectfully states:

- 1. Debtor admits the allegations contained in Paragraph 1 of the Motion.
- 2. Debtor is without sufficient information to admit or deny the allegations contained in Paragraph 2 of the Motion.
- 3. Debtor admits the allegations contained in the first sentence in Paragraph 3, and denies the allegations contained in the second sentence in Paragraph 3 of the Motion.
 - 4. Debtor admits the allegations contained in Paragraph 4 of the Motion.
 - 5. Debtor denies the allegations contained in Paragraph 5 of the Motion.

Case 08-42075 Doc 44 Filed 08/31/09 Entered 08/31/09 17:37:46 Desc Main Document Page 2 of 2

WHEREFORE, PREMISES CONSIDERED, the Debtor requests that the Court deny the Chapter7 Trustee's Motion, and grant such other relief as justice may require.

Dated: August 31, 2009.

By: /s/ Nathan M. Johnson

Howard Marc Spector

TBA #00785023

Nathan M. Johnson

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CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing pleading was served via electronic means to all parties who receive ECF notice in this case on August 31, 2009.

/s/ *Nathan M. Johnson*Nathan M. Johnson